

EXHIBIT 1

Plaintiffs' Proposed Interim Production Deadlines for Defendants' Custodial Productions

<u>Date</u>	<u>Event</u>	<u>Defendants' Position</u>
10/21/2024	Plaintiffs provide Defendants with proposed search terms to utilize with TAR review.	Defendants agree.
10/23/2024	Defendants provide Plaintiffs with proposed TAR protocol.	Defendants agree.
10/24/2024	Utilizing Plaintiffs' narrowed proposed custodian list, Defendants provide Plaintiffs with hit reports (deduplicated at the search term and search phrase level, and by custodian) for Plaintiffs' proposed search terms and any counterproposal terms.	Defendants agree.
10/25/2024	Plaintiffs provide any revised search terms, as necessary. Plaintiffs provide Defendants with any proposed revisions to TAR protocol.	Defendants agree.
10/28/2024	Defendants provide Plaintiffs with revised hit reports (deduplicated at the search term and search phrase level, and by custodian) as necessary.	Defendants agree.
10/29/2024	The parties raise any search term / burden issues with the Court. The parties raise any TAR protocol disputes with the Court.	Defendants do not agree.
11/1/2024	Defendants make initial rolling production of responsive custodial documents from the approximately 600,000 documents "left over" from Plaintiffs' pre-Complaint investigation.	Defendants do not agree.
11/8/2024	Defendants will validate their use of search terms by reviewing a random sample of 400 documents in the null set, i.e., documents that do not hit on the search terms, and provide to Plaintiffs information concerning responsiveness and other related metrics.	Defendants do not agree.
11/13/2024	Deadline for either party to raise issues with the Court concerning the validation/sampling of proposed search terms.	Defendants do not agree.
11/15/2024	Defendants provide first rolling production of responsive documents using search terms plus TAR, based on a targeted review of approximately 400,000 per week, unless Defendants validate a 70% recall before all rolling productions are completed. Defendants continue to provide rolling productions at least every two weeks until January 10, 2024. Defendants also	Defendants do not agree.

	<p>agree to provide a corresponding privilege log within two weeks after each rolling production.</p> <p>If Defendants have failed to achieve a recall rate of at least 70% by January 15, 2025, Defendants must produce out all remaining documents identified by TAR as potentially responsive.</p>	
1/20/2025	<p>Defendants provide information sufficient to show that the search methods utilized by Defendants to cull the document universe are validated over the full custodial collection, consistent with Plaintiffs' custodian proposal.</p> <p>Specifically, Defendants will provide statistics including precision and recall, with a margin of sampling error of 2.5% or lower, for validation sampling that was run against the entire document universe, and will provide a breakdown of those statistics for (1) the TAR population, i.e., documents that were TAR-eligible and hit on search terms; (2) the non-TAR search term hit files, i.e., media files and other data types that hit on search terms but were not suitable for TAR; and (3) the search term non-hit files, i.e., the remaining documents not covered by either of the other two categories.</p>	Defendants do not agree.